

## Kirchner, Karen

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**From:** Krueger, Thomas  
**Sent:** Monday, June 01, 2015 10:12 AM  
**To:** Dan Cory  
**Cc:** Ashleigh.Morris@usdoj.gov; Deveau, Frank; Vince Angermeier; Susan Franzetti; Jeff Featherstun; Stephen Studer; Jim Woodsmall; Jeff Claflin; Don Kiesling; kgaskill@mlc-usa.com; SThill@idem.IN.gov; Vogel, Arthur A. (MKE x 1545) (arthur.vogel@quarles.com); Thao Nguyen; Stemerick, Jeffrey D. (JStemerick@taftlaw.com); Kirchner, Karen; Quadri, Syed; Zaharoff, Josh; KASARABADA, PRABHAKAR; Bonar- Bridges, James; Petroff, Douglas  
**Subject:** RE: Lusher Street Groundwater - CD and SOW Mark-ups  
**Attachments:** Lusher Draft CD - Edits and Comments to EPA Draft 5.22.15.Agency notes 6.1.15. .pdf; Lusher Draft SOW - Mark-Up of EPA Draft 5.22.15.Agency notes 6.1.15.pdf

Thank you for the markups of the CD and SOW. In the interest of focusing our discussions tomorrow, EPA, DOJ and IDEM have prepared the attached comments on the marked up documents. We look forward to a productive meeting tomorrow.

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**From:** Dan Cory [mailto:dcory@psrb.com]  
**Sent:** Friday, May 22, 2015 3:27 PM  
**To:** Krueger, Thomas  
**Cc:** Ashleigh.Morris@usdoj.gov; Deveau, Frank; Vince Angermeier; Susan Franzetti; Jeff Featherstun; Stephen Studer; Jim Woodsmall; Jeff Claflin; Don Kiesling; kgaskill@mlc-usa.com; SThill@idem.IN.gov; Vogel, Arthur A. (MKE x1545) (arthur.vogel@quarles.com); Thao Nguyen; Stemerick, Jeffrey D. (JStemerick@taftlaw.com)  
**Subject:** Lusher Street Groundwater - CD and SOW Mark-ups

Tom,

As discussed on the April 20 call, please find attached mark-ups of 1) the draft Consent Decree ("CD"); and 2) the draft Statement of Work ("SOW"). These are redlines of the EPA's drafts, which were included as attachments to EPA's February 2015 Special Notice letters.

Please note that all of the parties that signed on to the April 2 Good Faith Offer letter to EPA have also signed on to these mark-ups, and all of these parties continue to participate in the negotiations with EPA subject to the conditions and reservations that were set forth in the Good Faith Offer letter (as clarified in the subsequent e-mail communication from Arthur Vogel on April 17).

Don't hesitate to contact me or any of the other counsel if you have any questions or concerns. Otherwise, we look forward to further discussions in our meeting on June 2 at your offices.

Regards,  
Dan

Daniel P. Cory  
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